

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In re: Lakeisha Horne  
Debtors

CHAPTER 13

Lakeview Loan Servicing, LLC,  
Movant,  
v.

BANKRUPTCY CASE NUMBER  
22-12912-mdc

Lakeisha Horne,  
Respondent/Debtors,  
and  
Kenneth E. West, Office of the Chapter 13  
Standing Trustee, Trustee,  
Additional Respondent.

**OBJECTION OF LAKEVIEW LOAN SERVICING, LLC TO CONFIRMATION OF  
DEBTOR'S CHAPTER 13 PLAN OF REORGANIZATION**

Lakeview Loan Servicing, LLC (“Movant”), by and through its counsel, LOGS Legal Group LLP, hereby objects to the confirmation of Debtor's Chapter 13 Plan, and in support thereof, avers as follows:

1. On or about October 30, 2022, Debtors filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
2. Movant holds an allowed claim, secured only by Debtor's principal residence located at 107 West Washington Lane, Philadelphia, PA 19144.
3. On or about January 6, 2023, Movant filed a Proof of Claim citing arrears in the amount of \$134,052.78, and a total claim in the amount of \$299,586.03.
4. Debtor's proposed plan calls for the payment to Rightpath Servicing, rather than Lakeview Loan Servicing, LLC.
5. Moreover, the Plan states arrearages are only in the amount of \$36,500.00 to be paid to the Trustee through the Plan.
6. The Plan is insufficiently funded to pay Movant its actual arrearage claim or total debt claim in full.
7. The Plan fails to comply with 11 U.S.C. § 1322.
8. The Plan fails to comply with 11 U.S.C. § 1325.

9. The Court must deny confirmation of Debtor's Chapter 13 Plan.

WHEREFORE, Lakeview Loan Servicing, LLC respectfully requests that confirmation of the Debtor's Plan be denied, that Debtor's bankruptcy petition be dismissed with prejudice; and for such other relief as this Court deems appropriate.

Respectfully submitted,

Dated: 1.11.23

BY: /s/ Lorraine Gazzara Doyle  
CHRISTOPHER A. DENARDO #78447  
LORRAINE GAZZARA DOYLE, #34576  
LOGS Legal Group LLP  
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King of Prussia, PA 19406  
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LLG File #:23-068442

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**CERTIFICATE OF SERVICE**

I, Lorraine Gazzara Doyle, an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of Lakeview Loan Servicing, LLC's Objection to the Confirmation of Debtor's Chapter 13 Plan by First Class Mail, postage prepaid or by electronic notification, at the respective last known address or email address of each person set forth below on January 12, 2023:

David M. Offen, Esquire  
The Curtis Center  
601 Walnut Street  
Suite 160 West  
Philadelphia, PA 19106  
Sent via electronic notification dmo160west@gmail.com

Kenneth E. West, Office of the Chapter 13 Standing Trustee, Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107  
Sent via electronic notification ecfemails@ph13trustee.com

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS  
TRUE AND CORRECT.

/s/ Lorraine Gazzara Doyle

CHRISTOPHER A. DENARDO #78447  
LORRAINE GAZZARA DOYLE, #34576  
LOGS Legal Group LLP  
3600 Horizon Drive, Suite 150  
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(610) 278-6800

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